

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Edward Dickerson

Case No.

Case: 2:23-mj-30109  
Assigned To : Unassigned  
Assign. Date : 3/15/2023  
Description: COMP USA V.  
DICKERSON (KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 14, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922(g)(1)  
21 U.S.C. § 841(a)(1)

Felon in possession of a firearm  
Possession with intent to distribute controlled substances

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



*Complainant's signature*

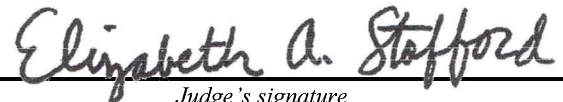
Mallorie Campbell, Special Agent (ATF)

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 15, 2023

City and state: Detroit, Michigan



*Judge's signature*

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT**

I, Special Agent Mallorie Campbell, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and have been since December of 2021. I am currently assigned to the Detroit Field Division, Group IV. I am also a participating member of the Michigan State Police Metro Narcotics Enforcement Team. I have had extensive training at the Federal Law Enforcement Training Center in both the Criminal Investigator Training Program and ATF Special Agent Basic Training.

2. Prior to becoming a Special Agent with ATF, I was employed as a Sheriff's Deputy with the Jefferson County Sheriff's Office in Louisville, KY, for approximately eight years. While with the Jefferson County Sheriff's Office, I was assigned to the Federal Bureau of Investigation's Louisville, Kentucky, White Collar Crimes Task Force for approximately four years. As an FBI TFO and as a Special Agent with the ATF, I have participated in numerous state and federal investigations to include firearms cases, financial crimes, healthcare

fraud, illegal narcotics investigations, gang investigations, human trafficking investigations, and threat and extortion cases, among others.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

4. ATF and MSP are currently investigating Edward Lee DICKERSON (B/M; DOB: XX/XX/1977) for violating 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm) and 21 U.S.C. § 841(a)(1) (Possession with Intent to Manufacture, Distribute, or Dispense a Controlled Substance).

### **PROBABLE CAUSE**

5. On or about the first week of March 2023, MSP's Metro Narcotics Enforcement Team (MNET) received information from an

anonymous source stating that a black male who goes by “Ed” living at 6776 Evergreen Road, Detroit, MI, was involved in selling narcotics out of his residence.

6. Law Enforcement used multiple open-source law enforcement databases and identified “Ed” as Edward Lee DICKERSON (B/M; DOB: XX/XX/1977).

7. On or about March 6, 2023, MNET Detectives conducted surveillance of 6776 Evergreen Road, Detroit, MI. MNET Detectives observed an individual matching the description of DICKERSON coming and going from the residence driving a grey Lexus SUV bearing Ohio license plate (xxxxxxx0). MNET Detectives also saw DICKERSON conduct what appeared to be a hand-to-hand drug deals consistent with narcotics trafficking at the residence (6776 Evergreen Road).

8. On or about March 7, 2023, MNET Detectives conducted a trash pull: they recovered trash from a receptacle placed curbside for garbage pick-up in front of the residence located at 6776 Evergreen Road. In the trash Detectives found multiple clear plastic baggies and cut lottery tickets, which are consistent with drug trafficking. Officers conducted a field test on one of the clear plastic baggies, which tested

positive for the presence of cocaine. Detectives also found three pieces of mail in the name of Edward DICKERSON in the trash.

9. On or about March 8, 2023, MNET Detectives again conducted surveillance of 6776 Evergreen Road, Detroit, MI, utilizing physical and electronic surveillance. MNET Detectives observed an individual matching the description of DICKERSON coming and going from the residence driving the same grey Lexus SUV. MNET Detectives also saw DICKERSON conduct what appeared to be two short stay drug sales consistent with drug trafficking.

10. Based on the investigative information, probable cause was obtained for a State of Michigan search warrant for 6776 Evergreen Road, Detroit MI.

11. On March 14, 2023, at approximately 0630 hours, Michigan State Police executed the search warrant at 6776 Evergreen Rd, Detroit, MI. ATF agents were also present. DICKERSON was inside the residence at the time. Law enforcement found and seized three firearms and significant quantities of narcotics from the residence. Specifically, law enforcement found a Glock pistol, a Charter Arms revolver, and a Bushmaster AR-15 style rifle in the residence. The Glock pistol and the

Bushmaster rifle were identified as stolen in law enforcement databases. Law enforcement also found approximately 28.5 grams of suspected heroin, approximately 271.9 grams of suspected cocaine, and approximately 115.7 grams of suspected fentanyl, all of which tested positive for the presence of the specified controlled substances through the use of TruNarc narcotics testing equipment. Some of the narcotics were found pre-packaged in small quantities within small plastic baggies—user amounts—consistent with narcotics trafficking. DICKERSON was arrested.

12. On March 14, 2023, MNET Detectives conducted a post *Miranda* interview of DICKERSON. DICKERSON admitted to distributing/selling narcotics and to purchasing the three firearms for personal protection.

13. On March 14, 2023, I spoke with Special Agent Michael Jacobs who is recognized by the ATF as having expertise in the interstate nexus of firearms. Based on the information provided and without physically inspecting the firearms, Special Agent Jacobs determined that the Glock pistol, the Charter Arms revolver, and the Bushmaster AR-15 style rifle found in the residence meet the definition of a firearm as

defined in 18 U.S.C. § 921(a)(3) and were manufactured outside the State of Michigan. Therefore, there is probable cause to believe that these firearms all traveled in and affected interstate commerce.

14. I reviewed DICKERSON's computerized criminal history and some of his online court records and it appears that DICKERSON has at least six felony convictions, including five drug offenses:

- a. 1999: Felony Controlled Substance, Deliver/Manufacture (cocaine, heroin, or another narcotic) less than 50 grams;
- b. 2003: Felony Controlled Substance, Deliver/Manufacture (cocaine, heroin, or another narcotic) less than 50 grams;
- c. 2005: Attempt, Felony Controlled Substance, Deliver/Manufacture (cocaine, heroin, or another narcotic) less than 50 grams;
- d. 2006: Felony Controlled Substance, Deliver/Manufacture (marijuana/synthetic equivalents);
- e. 2009: Felony Controlled Substance, Deliver/Manufacture (cocaine, heroin, or another narcotic) less than 50 grams; and

f. 2014: Two counts of Assault with Intent to do Great Bodily Harm Less than Murder, Felony Weapons, Firearm—Possession by Felon, and Felony Firearm.

15. And according to the Michigan Department of Corrections, DICKERSON served more than a year in prison on at least one of these convictions.

16. Based on these convictions and that DICKERSON appears to have served a sentence of more than a year in the Michigan Department of Corrections on at least one of these convictions, there is probable cause to believe that DICKERSON was aware of his status as a convicted felon.

### **CONCLUSION**

17. Based upon the facts stated herein, there is probable cause to believe that Edward DICKERSON (B/M; DOB: XX/XX/1977), a convicted felon, did knowingly and intentionally possess a firearm in violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). There is also probable cause to believe that DICKERSON knowingly or intentionally possessed with intent to manufacture, distribute, or dispense controlled substances in violation of 21 U.S.C. § 841(a)(1).



These violations occurred in Detroit, Michigan, in the Eastern District of Michigan.

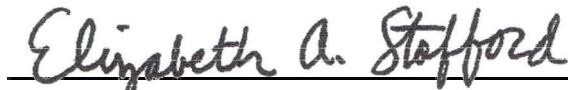
Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Mallorie Campbell', written in a cursive style.

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Mallorie Campbell  
Special Agent, ATF

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in dark ink, appearing to read 'Elizabeth A. Stafford', written in a cursive style.

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Elizabeth A. Stafford  
United States Magistrate Judge

Dated: March 15, 2023